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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E. G., a minor, by and through her
Guardian Ad Litem, ALFONSO GOMEZ
LEPE,

Plaintiff,

vs.

ALBERTO MARTINEZ MALDONADO;
SECURITY CODE 3 aka SECURITY
CODE 3, INC.; WATSONVILLE
COMMUNITY HOSPITAL; DR. GORDON
KAPLAN, in his individual capacity and in
his official capacity acting under color of
law; DR. STERLING LEWIS, in his
individual capacity and in his official
capacity acting under color of law; DR.
STUART A. SIMION, in his individual
capacity and in his official capacity acting
under color of law; and DOES 1 through
100, in their individual capacities and their
official capacities acting under color of law,

Defendants.

Case No. 5:14-CV-01053-LHK

STIPULATION FOR EXTENSION OF
TIME TO FILE RESPONSE TO FIRST
AMENDED COMPLAINT ON BEHALF
OF DEFENDANTS DR. GORDON
KAPLAN, DR. STERLING LEWIS AND
DR. STUART A. SIMON

Judge: Honorable Lucy H. Koh
Date Action Filed: March 6, 2014
Trial Date: None assigned

Pursuant to Civil Local Rule 6-1(a), Plaintiff E. G., a minor, by and through her
Guardian Ad Litem, ALFONSO GOMEZ LEPE, by and through her attorneys of record,
Adam Carlson and Stan Casper of the Casper, Meadows, Schwartz & Cook law firm, and
Defendants DR. GORDON KAPLAN, DR. LEWIS STERLING, and DR. STUART A. SIMON by
and through their attorney, B. Thomas French of the Hassard, Bonnington LLP law firm,

1 hereby stipulate to an extension of time for Defendants DR. GORDON KAPLAN, DR. LEWIS
2 STERLING, and DR. STUART A. SIMON to file a responsive pleading to Plaintiff's First
3 Amended Complaint.

4 **RECITALS**

5 1. WHEREAS, the original Complaint in this matter was filed on March 6, 2014.
6 2. WHEREAS, Plaintiff filed a First Amended Complaint on November 26, 2014.
7 3. WHEREAS, the parties have agreed that a response to the First Amended
8 Complaint by Defendants DR. GORDON KAPLAN, DR. LEWIS STERLING, and DR. STUART
9 A. SIMON, may be filed no later than December 17, 2014.
10 4. WHEREAS, Pursuant to Civil Local Rule 6-1(a), the parties attest that the
11 requested extension of time to answer or otherwise respond will not alter the date of any event
12 or any deadline already fixed by Court order.

13 **STIPULATION**

14 IT IS HEREBY STIPULATED that the response of Defendants DR. GORDON KAPLAN,
15 DR. LEWIS STERLING, and DR. STUART A. SIMON to the First Amended Complaint will be
16 filed and served no later than December 17, 2014.

17
18 DATE: December 9, 2014

HASSARD BONNINGTON LLP

19
20 By: /s/
B. THOMAS FRENCH
Attorney for Defendants
21 Dr. Kaplan, Dr. Sterling and Dr. Simon

22
23 DATE: December 9, 2014

CASPER, MEADOWS, SCHWARTZ & COOK

24
25 By: /s/
ADAM CARLSON
26 STAN CASPER
Attorneys for Plaintiff
27 E.G., a minor, by and through her Guardian
Ad Litem, ALFONSO GOMEZ LEPE